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*Attorneys for Defendants  
Kara LeGrand, Colette Stammerjohn  
and Maria Ward*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALEJANDRO SANCHEZ,  
  
Plaintiff,  
  
v.  
  
MARIA WARD, *et al.*,  
  
Defendant.

Case No. 3:21-cv-00361-MMD-CLB  
**ORDER GRANTING**  
**MOTION FOR EXTENSION OF TIME**  
**TO FILE MOTION FOR SUMMARY**  
**JUDGMENT**  
**[FIRST REQUEST]**

Defendants Kara LeGrand, Colette Stammerjohn, and Maria Ward, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Laura M. Ginn, Deputy Attorney General, hereby move this Court for an extension of time to file a Motion for Summary Judgment. This Motion is made and based upon Federal Rule of Civil Procedure 6(b)(1)(A) and LR 26-3.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. FACTUAL ANALYSIS**

This is an inmate civil rights action brought by Plaintiff, Alejandro Sanchez (Sanchez), pursuant to 42 U.S.C. § 1983. On August 9, 2022, this Court issued its scheduling order. ECF No. 27. The scheduling order included a discovery deadline of February 6, 2023 and a dispositive motions deadline of March 8, 2023. *Id.*

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**II. ARGUMENT**

Defense counsel respectfully requests a thirty (30) day extension of time to file Defendants' dispositive motions from the current deadline of **March 8, 2023** until **April 8, 2023**. Defendants provide the following information in accordance with Local Rule 26-3.

**A. Discovery Completed**

- Defendants sent Initial Disclosures
- Plaintiff sent Initial Disclosures

**B. Discovery that Remains to be Completed**

Discovery is closed. It is Defendants' position that no further discovery remains to be completed.

**C. Reasons why the Deadlines Were not Satisfied**

No additional discovery is needed in this matter.

**D. Proposed Deadlines**

Dispositive motion deadline: April 8, 2023

Joint pretrial order (if no dispositive motions filed): May 8, 2023

**E. Good Cause Supports this Request**

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

This Court should find good cause supports this request. When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

This is Defendants' first request. Defendants' request is timely and will not hinder or prejudice Plaintiff's case. The requested extension of time will permit and will allow for Undersigned Counsel to obtain the necessary declarations to support their Summary Judgment. Counsel has been diligently working on the dispositive motion in this case and is working to get declarations from the Defendants. Therefore, good cause is present to grant the Defendants' request additional time to prepare the dispositive motion.

1 **III. CONCLUSION**

2 Defendants request this Court extend the deadline for dispositive motions in this  
3 matter. Defendants assert that the requisite good cause is present to warrant the requested  
4 extension of time. The request is timely. Therefore, the Defendants request an extension  
5 as follows:

6 1. The time for the parties to file any dispositive motion be extended by thirty  
7 (30) days from March 8, 2023 until April 8, 2023.

8 2. If no dispositive motions are filed, the Joint Pretrial Order shall be filed on or  
9 before Monday, May 8, 2023. If the parties file dispositive motions, the Joint Pretrial Order  
10 shall be filed thirty (30) days after the Court serves its order disposing of the dispositive  
11 motions, or further Court order.

12 DATED this 7th day of March, 2023.


13 AARON D. FORD  
14 Attorney General

15 By: /s/ Laura M. Ginn  
16 LAURA M. GINN, Bar No. 8085  
17 Deputy Attorney General

18 *Attorneys for Defendant*

19 **IT IS SO ORDERED.**

20 **DATED:** March 8, 2023

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23 UNITED STATES MAGISTRATE JUDGE  
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